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Application granted. SO ORDERED.

August 16, 2022      /s/ John G. Koeltl  
New York, NY      John G. Koeltl, U.S.D.J.

May 20, 2021

Re: *Nexstar Media Inc. v. Comcast Cable Communications, LLC*, No. 1:21-cv-06860-JGK

**VIA ECF**

The Honorable John G. Koeltl  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Dear Judge Koeltl:

We represent Defendant/Counterclaim-Plaintiff Comcast Cable Communications, LLC (“Comcast”) in the above-referenced action. Pursuant to Rule VI.A.2 of Your Honor’s Individual Practices, we write to request permission to file under temporary seal unredacted versions of Comcast’s (i) Answer to the Complaint and Counterclaim (“Answer and Counterclaim”) and (ii) Third-Party Complaint (“Third-Party Complaint”) against Mission Broadcasting, Inc. (“Mission”), both of which we are submitting herewith. These pleadings reference certain information that previously was sealed in this case in connection with Comcast’s Motion to Stay or Dismiss the Complaint (“Motion”). Although Comcast previously requested (and received) permission from the Court to redact such information, it does not seek to do so at this time in light of Second Circuit authority recognizing that “[a] complaint, which initiates judicial proceedings, is the cornerstone of every case, the very architecture of the lawsuit, and access to the complaint is almost always necessary if the public is to understand a court’s decision.” *Bernstein v. Bernstein Litowitz Berger & Grossman LLP*, 814 F.3d 132, 140 (2d Cir. 2016) (internal quotation marks and citation omitted). In addition, Comcast is not filing with its pleadings any of the underlying documents filed in support of its Motion, thereby preserving the confidentiality of all information in the underlying documents that is not reflected on the face of Comcast’s pleadings.

Prior to filing its Answer and Counterclaim and Third-Party Complaint, Comcast communicated its position to Nexstar via email. In response, Nexstar requested that Comcast file its pleadings under temporary seal and make certain redactions to the publicly filed versions to afford Nexstar (and possibly Mission) the opportunity to file a motion for permanent redaction if they choose to do so. Comcast has proceeded accordingly, and the proposed public versions of the pleadings submitted herewith reflect Nexstar’s requested redactions. Pursuant to Rule VI.A.2 of Your Honor’s Individual Practices, we have notified Nexstar of its obligation to file a letter within three days of Comcast’s filing that explains any need to redact the materials permanently and will be notifying Mission of the same.<sup>1</sup>

<sup>1</sup> Comcast has not had any pre-filing communications with Third-Party Defendant Mission about the pleadings Comcast is filing today. Thus, to preserve Mission’s ability to seek confidential treatment for information contained in Comcast’s pleadings, Comcast is providing Mission’s President—concurrent with Comcast’s filing—with an electronic copy of this letter, along with, among other things, the Third-Party Complaint, the Answer and Counterclaim, a copy of Your Honor’s Individual Practices, and notice of Mission’s obligations under Rule VI.A.2.

**DavisPolk** Honorable John G. Koeltl

As required by Rule VI.A.2 of Your Honor's Individual Practices, Comcast submits herewith: (i) an unredacted copy of the Answer and Counterclaim, which, if Comcast's application were granted, would be placed under temporary seal; (ii) a proposed public version of the Answer and Counterclaim; (iii) an unredacted copy of the Third-Party Complaint, which, if Comcast's request were granted, would be placed under temporary seal; and (iv) a proposed public version of the Third-Party Complaint.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Dana M. Seshens  
Dana M. Seshens

cc: All counsel of record (via ECF)